UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: THOMAS JAMES KENNEALLY a/k/a : CHAPTER 13

THOMAS KENNEALLY a/k/a

THOMAS J. KENNEALLY :

Debtor

JACK N. ZAHAROPOULOS

STANDING CHAPTER 13 TRUSTEE

Movant

:

v. :

:

THOMAS JAMES KENNEALLY a/k/a:

THOMAS KENNEALLY a/k/a

THOMAS J. KENNEALLY

Respondent : CASE NO. 5:21-BK-786

RESPONSE TO OBJECTION TO DEBTOR'S EXEMPTIONS

AND NOW comes Debtor, Thomas James Kenneally, and responds to the Objection of Standing Chapter 13 Trustee to Debtor's Exemptions as follows:

1. Denied. Debtor submits the exemption of assets under 11 U.S.C. § 522(b)(3) is appropriate.

WHEREFORE, Debtor requests the Court deny Trustee's Objection to Debtor's Exemptions.

Respectfully Submitted,

NEWMAN WILLIAMS, P.C.

/s/ Robert J. Kidwell 712 Monroe Street Stroudsburg, PA 18360 Attorneys for Debtor